



PENNRIDGE SCHOOL DISTRICT

Perkasie, Pennsylvania 18944-2295

April 12, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Request for Waiver of Form 471 Filing Deadline for Funding Year 2018
CC Docket No. 02-6

Contact:

Pennridge School District
BEN: 126063
Diane T. Miller, Director of Technology
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FY 2018 Form 471 Application #: **181042550**

Dear Ms. Dortch,

I am writing to respectfully request the FCC to grant a waiver of the Funding Year 2018 Form 471 deadline so that our Form 471 E-rate application will be considered as having been filed within the 'window.' The Form 471 was submitted on April 12, 2018.

Reason for submitting late:

Pennridge School District of Perkasie, PA. seeks an FCC Waiver for FY2018/19 FCC Form 471 # 181042550. This application was filed after the March 23, 2018 deadline due to an inadvertent error. The District intended to file for an on-going, contracted WAN service as was communicated to our E-Rate Agent during FY2018/19 E-Rate planning meetings. However, during the Agent's typical procedures to transcribe information from the meeting into calculation worksheets that form the basis of the Form 471 application, there was an inadvertent error made and the information was not transcribed.

We hope the Commission will deem our circumstances to be consistent with the Commission's Bishop Perry Order and the Wireline Competition Bureau's (Bureau) Academy for Academic Excellence Order. In addition, we believe our circumstances have a precedent in the following Commission Orders:

Acorn Public Library Order (https://apps.fcc.gov/edocs_public/attachmatch/DA-08-2376A1.pdf)

*In 2006 and 2007, in the Bishop Perry Order and the Academy for Academic Excellence Order, the Commission and the Bureau, respectively, granted waivers to applicants who missed the FCC Form 471 filing window deadline due to circumstances beyond their control, including inclement weather, technical malfunctions, school reorganizations, misunderstandings/confusion, personal emergencies, or **inadvertent errors**.*

We find that the delay in these specific cases was not likely to impede USAC's ability to administer the E-rate program. Because the violation at issue is procedural, not substantive, we find that complete rejection of each of these applications is not warranted. Therefore, in the absence of any evidence of waste, fraud, or abuse, misuse of funds, or a failure to adhere to core program requirements and because the FCC Form 471 was filed within 14 days after the filing window deadline, we find it in the public interest to waive the FCC Form 471 deadline. (10/30/2008)

Academy of Math and Science Order (https://apps.fcc.gov/edocs_public/attachmatch/FCC-10-122A1.pdf). *Consistent with our precedent, we find that these violations do not constitute substantive violations of the Commission's rules, but instead are procedural violations, and therefore, a complete rejection of these applications is not warranted. While filing and other procedural deadlines are necessary to maintain the efficient administration of the application process, we find that these applications were filed close enough to the deadline so as not to impair the administration of the program. (7/7/2010)*

We realize that previous precedent is for the Commission to grant Form 471 deadline waiver requests if the Form was submitted within 14 days of the Form 471 deadline.¹ In light of the reasons stated above, we respectfully request the FCC view these extenuating circumstances as good cause to waive the Form 471 deadline for this application.

Thank you for your consideration of our request.

Respectfully submitted,



Diane T. Miller
Pennridge School District
Director of Technology

¹ *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259, para. 8 (2010) (Academy of Math and Science Order).*